

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

**CHALONA MOSLEY, Individually and as
Personal Representative on Behalf of the
Wrongful Death Beneficiaries of JUSTIN MOSLEY**

PLAINTIFF

V.

CIVIL ACTION NO. 3:23-CV-135-CWR-FKB

**HINDS COUNTY, MISSISSIPPI, QCHC INC.,
QCHC OF MISSISSIPPI, LLC, BRITTANY PIPPINS,
DEBRA BELL, PAMELA MARTIN, and JOHN AND
JANE DOES 1 – 100**

DEFENDANTS

MOTION TO WITHDRAW AS COUNSEL

The undersigned attorney, Ashley W. Gunn, files this Motion to Withdraw as counsel of record for Defendant, Quality Correctional Health Care, Inc. and states as follows:

1. Ashley W. Gunn and Lynda C. Carter of Wise Carter Child & Caraway, P.A. are currently counsel of record for Defendant, Quality Correctional Health Care, Inc. Ashley Gunn did not enter a formal appearance in this matter, but her contact information appears in the signature panel of co-counsel's filings. Out of an abundance of caution, Mrs. Gunn files the subject Motion to Withdraw from representation.

2. On May 24, 2023, Ashley W. Gunn will no longer be associated with the firm of Wise Carter Child & Caraway, P.A.

3. Defendant, Quality Correctional Health Care, Inc. will continue to be represented by Lynda C. Carter and the law firm of Wise Carter Child & Caraway, P.A., following Ashley W. Gunn's departure.

4. Ashley W. Gunn's withdrawal as counsel of record in this matter will not

unreasonably delay the case or prejudice the parties in any manner.

WHEREFORE, PREMISES CONSIDERED, Ashley W. Gunn respectfully requests the Court to enter an Order permitting her withdrawal as counsel of record for Defendant, Quality Correctional Health Care, Inc.

RESPECTFULLY SUBMITTED, this the 22nd day of May, 2023.

By: s/Ashley W. Gunn

WISE CARTER CHILD & CARAWAY, P.A.

Lynda C. Carter (MSB # 99539)
Ashley W. Gunn (MSB #104375)
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CERTIFICATE OF SERVICE

I, Lynda C. Carter, hereby certify that the foregoing has been filed with the Clerk of Court using this Court's ECF system, which sent notification of such filing to the following counsel or record:

Courtney D. Sanders
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500 North State Street
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Attorney for Plaintiff

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Attorney for Plaintiff

SO CERTIFIED, this the 22nd day of May, 2023.

BY: s/Ashley W. Gunn
Ashley W. Gunn (MSB #104375)

OF COUNSEL:

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Ashley W. Gunn (MSB #104375)
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